



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

LAB/IC
F. #2023R00176

271 Cadman Plaza East
Brooklyn, New York 11201

March 3, 2025

By ECF

The Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Dawood Kassim
Criminal Case No. 24-67 (KAM)

Dear Judge Matsumoto:

The government respectfully submits this letter in response to the Court's February 28, 2025 order that the government respond to the defendant's bond modification request filed in the above-captioned matter on February 28, 2025 (ECF No. 48). The defendant requests a modification to his bond condition that the curfew that requires the defendant to remain in his home between 10:00 p.m. and 6:00 a.m. be altered to 2:00 a.m. and 6:00 a.m. to allow for the defendant's observation of Ramadan at his mosque, located at 682 Wyona Street in Brooklyn. The defendant requests that this modification be in place until April 1, 2025, which is the end of Ramadan and Eid ul-Fitr. Pretrial Services does not object to the modification.

The government was first contacted about the defendant's proposed bond modification in the afternoon of February 28, 2025, only several hours before the defendant filed the modification request with the Court and was unable to diligence and respond to the request before the defendant's filing. Despite the request that would significantly curtail the hours of the

curfew, given the details of the religious observance provided by the defendant and that the modification is limited to the month of March, the government does not object to the modification.

Respectfully submitted,

JOHN J. DURHAM
United States Attorney

By: _____ /s/
Lauren A. Bowman
Irisa Chen
Assistant U.S. Attorney
(718) 254-7000

cc: Clerk of Court (KAM) (by ECF)
Counsel of Record (by ECF and Email)
Samantha Eden, United States Pretrial Services Officer (by Email)